

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION)	)	
BUREAU, et al.,	)	
	)	
Plaintiffs,	)	CASE NO. 24-CV-40-EAW-MJR
	)	
v.	)	
	)	
STRATFS, LLC (f/k/a STRATEGIC FINANCIAL)	)	
SOLUTIONS, LLC), et al.	)	
	)	
Defendants, and	)	
	)	
DANIEL BLUMKIN, et al.	)	
	)	
Relief Defendants.	)	

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**DEFENDANTS' COMBINED  
PRELIMINARY INJUNCTION HEARING WITNESS LIST**

Defendants StratFS, LLC (f/k/a Strategic Financial Solutions, LLC), Strategic Client Support, LLC, Strategic CS, LLC, Strategic FS Buffalo, LLC, Strategic NYC, LLC, BCF Capital, LLC, T Fin, LLC, Strategic Consulting, LLC, Versara Lending, LLC, Strategic Family, Inc., Anchor Client Services, LLC, Bedrock Client Services, LLC, Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Great Lakes Client Services, LLC, Guidestone Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC, Newport Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LLC, Pioneer Client Servicing, LLC, Rockwell Client Services, LLC, Royal Client Services, LLC, Stonepoint Client Services, LLC, Summit Client Services, LLC, Whitestone Client Services, LLC, Individual Defendant Ryan Sasson, Relief Defendants Daniel Blumkin, Albert Ian Behar, Twist Financial, LLC, Duke Enterprises, LLC, and Blaise Investments

(collectively, “Defendants”) disclose the following witnesses that may be called in the Defendants’ case-in-chief:

1. Rick Gustafson
2. Mike Thurman
3. Joanna Hughes (nee Corbin)
4. Lisa Munyon
5. Ryan Sasson
6. Mary Lynn Clark
7. Heather Lyon
8. Lauren Branzetti
9. Greg Regan
10. Jason Blust
11. Eric Howell (live or by designation)
12. Michael Bonito (by designation)
13. Willard Lee Shirkey (by designation)
14. Olga Vrzhezhevski (by designation)
15. Mark Roberts (by designation)
16. Craig Horvath (by designation)
17. James Agosto (by designation)
18. Peter Fountain (by designation)
19. RAM 30(b)(6) (by designation)
20. Diane McKay (by designation)
21. Michelle Katherine Pennington (by designation)

Defendants reserve the right to amend this witness list to include additional witnesses by designation due to the fact that the expedited discovery ordered in this case by the TRO is ongoing and many of the deposition transcripts are not yet available. Defendants further reserve the right to counter-designate deposition testimony designated by Plaintiffs.

Dated: January 30, 2024

/s/ Ronald S. Safer

Ronald S. Safer (*pro hac vice*)

Rodney Perry (*pro hac vice*)

Matthew Kennison (*pro hac vice*)

Maegan McAdam

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Sasson and Relief Defendants Daniel  
Blumkin and Ian Behar*